

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

POINT BLANK BODY ARMOR, INC.

Plaintiff/Counter-Defendant,

v.

ALLEN PRICE, et al.

Defendants/Counter-Plaintiffs.

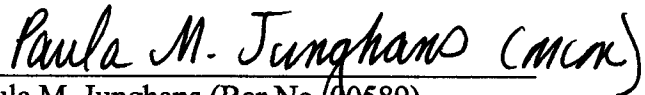
Civil Action No.

MJG-01 CV-3256

**PROPOSED VOIR DIRE QUESTIONS**

Plaintiff/Counter-Defendant, Point Blank Body Armor, Inc., by its undersigned counsel,  
proposes the following jury voir dire for use by the Court at the trial of this matter.

Respectfully submitted,



Paula M. Junghans (Bar No. 00589)

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Attorneys for Point Blank Body Armor, Inc.

### **PROPOSED NEUTRAL CASE SUMMARY**

This matter involves Allen Price, Joseph Krummel, and James Murray, and their former employer, Point Blank Body Armor, Inc. Messrs. Price, Krummel, and Murray each entered into a three-year employment contract with Point Blank Body Armor, Inc. for the term January 1, 2001 through December 31, 2003. In September of 2001, Messrs. Price, Krummel, and Murray resigned their employment with Point Blank Body Armor, Inc. This case is proceeding to trial to determine what Messrs. Price, Krummel, and Murray may be entitled to under the terms of their respective employment contracts.

### **PROPOSED VOIR DIRE QUESTIONS**

#### **Familiarity with the Case**

1. Do you, or any member of your family, have any knowledge of an kind regarding this lawsuit, other than what has been told to you here today?
2. Have you seen, read, or heard anything about this case in any newspaper, magazine, television, or radio?
3. Have you read or heard anything about this case from any source?

#### **Familiarity with the Parties, Counsel or Potential Witnesses**

1. Have you, or any member of your family, ever worked for, been employed by, or had any dealings with:

Point Blank Body Armor, Inc.

DHB Industries, Inc.

Allen Price

Joseph Krummel

James Murray

United States Ballistic Engineering, Inc.

2. The lawyers representing Point Blank Body Armor, Inc. are Paula M. Junghans and Melissa L. Mackiewicz of Piper Rudnick LLP, 1200 Nineteenth Street NW, Washington DC 20036-2412, and 6225 Smith Avenue, Baltimore, Maryland 21209-3600, respectively.

The lawyers representing Messrs. Price, Krummel, and Murray are Robert S. Brennen and William M. Krulak of Miles & Stockbridge, P.C., 10 Light Street, Baltimore, Maryland 21202.

- (a) Do you, or any member of your family, know any of these lawyers, or anyone who works at their law firms?
- (b) Have you, or any member of your family, worked for or applied for a job with any of these lawyers or law firms?
- (c) Have you, or any member of your family, even been represented by any of these lawyers or law firms, or been involved in any legal matter in which any of these lawyers or law firms represented another party?

3. The following persons and organizations may be called as witnesses or referred to during this trial. Have you, or any member of your family, ever had any contact or association, personal or professional, with any of these persons or organizations?

Allen Price

Joseph Krummel

James Murray

United States Ballistic Engineering, Inc.

Scott Bauernmaster

Raymond James Company

Terrence Butryn

Barrday, Inc.

David H. Brooks

Sandra Hatfield

Dawn Schlegel

Point Blank Body Armor, Inc.

Lanxide, Inc.

DHB Industries, Inc.

Catherine Dubbs

Sybil Schaffrath

Morgan Stanley Dean Witter

Shaye Sinanian

**Education, Training, Employment and Other Experience**

1. Have you, or any member of your family, studied law or had any legal training or experience?
2. Are you, or any member of your family, a lawyer?
3. Have you, or any member of your family, ever worked at a law firm or for a lawyer in any capacity?

4. Are you, or any member of your family, a judge, law clerk, court attendant, clerk or part of a court's personnel?

5. Have you, or any member of your family, ever had any employment, training or experience in the body armor industry?

6. Have you, or any member of your family, ever negotiated or entered into a written employment agreement?

7. Have you, or any member of your family, ever received stock certificates, stock options, or stock warrants as employment compensation?

8. Have you, or any member of your family, had any training or experience in starting or running a business?

9. Have you, or any member of your family, ever owned a business?

10. Have you, or any member of your family, ever been an officer, director, or shareholder of a company?

11. Have you, or any member of your family, ever been involved in a contract dispute?

12. Have you, or any member of your family, ever been involved in an employment dispute?

13. Have you, or any member of your family, ever been a party to a contract that was breached or broken?

14. Have you, or any member of your family, ever been involved in the decision to end a contract?

15. Have you, or any member of your family, ever been involved in the decision to terminate a business relationship with an individual or company?

16. Have you, or any member of your family, ever been involved in any way with claims or lawsuits that occurred as a result of a failure to uphold an agreement?

17. Have you, or any member of your family, ever been employed as a stockbroker or by a stock brokerage company?

18. Have you had any experience with the sale or disposition of restricted or unrestricted securities?

**Experience with the Legal System**

1. Have you ever served as a juror before?
2. Do you know any other member of the jury panel?
3. Have you, or any member of your family, ever sued anyone or presented a claim against anyone?
4. Have you, or any member of your family, ever been sued?
5. Have you ever appeared as a witness, given testimony in court, or been deposed?

**Bias, Prejudice and Ability to Serve**

1. It is estimated that the trial of this case will take approximately \_\_\_ days / weeks. In light of that, do you have any substantial reason why you could not serve as a member of the jury in this case?

2. Do you have any feelings either for or against corporations in general that would in any way affect your view in this case or make you more or less inclined to find in favor of either the Counter-Plaintiffs or the Counter-Defendant?

3. The law requires that your verdict cannot be based on suspicion, guesswork, or assumptions, but must be based on a careful review and analysis of all the evidence. Is there any reason that you believe that you may have difficulty in following that rule?

4. The Court will instruct you that, in arriving at a verdict, you must not be motivated by sympathy for or prejudice against any party, but that you must base your verdict solely on the evidence that will be produced in this courtroom in light of the Court's legal instructions. Are you unwilling or unable to follow such a rule?

5. Do you feel that you could not follow the Court's instructions on the law governing this case, even though you might have a differing personal view as to what the law should be?

6. Do you have any reason to believe that you might be prejudiced or biased either for or against either party to this litigation?

7. Do you have any physical conditions that make it:

(a) uncomfortable to sit for a long period of time?

- (b) difficult to hear what is going on in the courtroom?
- (c) difficult to see exhibits or other pieces of evidence that may be used during the trial?
- (d) some other type of physical problem that might interfere with the ability to concentrate on the case and what is going on in the courtroom?

8. Do you have any type of personal problems or other pressing matters of concern that would make it difficult or impossible for you to concentrate on what is going on during the trial because your mind would be elsewhere?

9. If you were selected as a juror in this case, do you know of any reason why you could not sit as an impartial juror?

10. Do you have any other information you believe we ought to know that might bear on your service as a juror in this case?



**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 23rd day of June, 2003, a copy of the foregoing  
Proposed Voir Dire Questions was delivered via electronic case filing and hand delivery to:

Robert S. Brennen, Esquire  
William M. Krulak, Esquire  
Miles & Stockbridge  
10 Light Street  
Baltimore, Maryland 21202

  
\_\_\_\_\_  
Melissa L. Mackiewicz